

UNITED STATES BANKRUPTCY COURT
DISTRICT OF SOUTH CAROLINA

In re:

Keith Andrew Wolff and
Wendy VonRecklinghausen Walker Wolff

Debtors.

Case No. 19-03618-dd
Chapter 7

APPLICATION TO EMPLOY REAL ESTATE AGENT

The Application of Kevin Campbell, Trustee in Bankruptcy for the Estate of the above-captioned Debtors, respectfully represents that:

1. Your Applicant is the duly appointed, qualified and acting Trustee for the Estate of the Debtor in the above-captioned matter.

2. Your Applicant desires to employ and retain Charlotte Bova, a sales associate with Charlotte Bova & Associates, Carolina One Real Estate, whose address is 873 Orleans Road, Ste. 102, Charleston, SC 29407, and whose telephone number is (843) 763-5765, to represent him as a Real Estate Agent in the sale of real property belonging to the Debtor located at 1023 Plantation Court, Mt. Pleasant, SC. The services the Real Estate Agent is to perform include obtaining a purchaser who is ready, willing, and able to buy the realty of the Estate, to advise and counsel the Trustee with regards to any transaction, to negotiate with any potential purchaser the terms of a sale, and to do other necessary services generally performed by a real estate agent.

3. Your Applicant desires to compensate such Real Estate Agent by paying a commission in the amount of no more than six percent (6%) of the sales price obtained on the subject residential property, to be paid upon closing of any transaction wherein the real estate agent performs such services.

4. Your Applicant is informed and believes that the Real Estate Agent is a disinterested party within the meaning of that term as it is used in §101(14) of the Bankruptcy Code.

5. Your Applicant is informed and believes that the Real Estate Agent has no connection with the Debtor, any creditors of the estate, any other party in interest, their respective attorneys and accountants, the United States Trustee, or any person employed in the Office of the United States Trustee other than, as indicated in the Statement of No Interest, Ms. Bova is employed by the Trustee in current cases and the Trustee does anticipate employing Ms. Bova in future cases.

WHEREFORE, your Applicant asks that the Court enter an Order authorizing him to employ Charlotte Bova as his Real Estate Agent.

/s/ Kevin Campbell

KEVIN CAMPBELL, Trustee

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District Court I.D. 30

MT. PLEASANT, SOUTH CAROLINA

Dated: July 30, 2019